

## STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0038831; AI 19627; PER20050001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

I.           **THE APPLICANT IS:**   Town of Franklinton  
Town of Franklinton Wastewater Treatment Facility  
301 11<sup>th</sup> Avenue  
Franklinton, LA 70438

II.           **PREPARED BY:**       Todd Franklin

**DATE PREPARED:**       February 22, 2006

III.           **PERMIT ACTION:**   reissue LPDES permit LA0038831, AI 19627; PER20050001

LPDES application received: June 23, 2005

EPA has not retained enforcement authority.

Previous LPDES permit issued: December 1, 2000

Previous LPDES permit expired: November 30, 2005

#### IV.           **FACILITY INFORMATION:**

A.       The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Town of Franklinton.

B.       The permit application does not indicate the receipt of industrial wastewater.

C.       The facility is located at the northwest end of Riverside Drive off of LA Highway 16 in Franklinton, Washington Parish.

D.       The treatment facility consists of an activated sludge treatment plant. Disinfection is by chlorination.

##### E.       Outfall 001

Discharge Location:   Latitude 30° 49' 59" North  
Longitude 90° 9' 22" West

Description:           treated sanitary wastewater

Design Capacity:       0.74 MGD

Type of Flow Measurement which the facility is currently using:

Combination Totalizing Meter / Continuous Recorder

**V. RECEIVING WATERS:**

The discharge is into an unnamed ditch; thence into the Bogue Chitto River in segment 090501 of the Pearl River Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 090501 of the Pearl River Basin are as indicated in the table below<sup>1/</sup>:

Overall Degree of Support for Segment	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Full	Full	Not Supported	Not Supported	N/A	N/A	N/A

<sup>1/</sup>The designated uses and degree of support for Segment 090501 of the Pearl River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

**VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 090501 of the Pearl River Basin, is listed in Section II.2 of the Implementation Strategy in a letter dated October 21, 2005, from Watson (FWLS) to Gautreaux (LDEQ), as a habitat for the Ringed Sawback Turtle, the Gulf Sturgeon, and the Louisiana Quillwort, which are listed as endangered or threatened species. This discharge is not expected to adversely impact any threatened or endangered species in the receiving waterbody and no further consultation is required by the FWLS.

**VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

**VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Todd Franklin  
Permits Division  
Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

**IX.**

**PROPOSED PERMIT LIMITS:**

Subsegment 090501, Bogue Chitto River-From Mississippi State Line to Pearl River Navigation Canal, is listed on LDEQ's Final 2004 303(d) List as impaired for mercury and turbidity. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Pearl River Basin, those suspected causes for impairment which are not directly attributed to the sanitary wastewater point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

**Mercury**

According to the 2004 305(b) Report, the mercury impairment is attributed to atmospheric deposition and unknown sources. To address the unknown source, the LDEQ must gather information concerning the mercury impairment. Therefore, for information purposes for future TMDL development, a reporting requirement for mercury shall be placed into the permit.

**Turbidity**

According to the 2004 305(b) Report, the turbidity impairment is attributed to sources outside state jurisdiction or borders, silviculture harvesting, and natural sources. Because the discharge consists of treated sanitary wastewater, which is not listed as a causing the turbidity impairment, no requirements for turbidity shall be placed into the permit.

**Final Effluent Limits:****OUTFALL 001**

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD <sub>5</sub>	62	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations-Policy-(SSEL) for facilities of this treatment type and size.
TSS	93	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Total Mercury	Report	Report (mg/l)	Report (mg/l)	Because the receiving waterbody is impaired for mercury, "Report" of mercury is proposed for information gathering purposes.

**Other Effluent Limitations:****1) Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038831: Issued: December 1, 2000  
 Expired: November 30, 2005

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD <sub>5</sub>	10 mg/l	15 mg/l	1/week	3-Hour Composite
TSS	15 mg/l	23 mg/l	1/week	3-Hour Composite
Fecal Coliform				
Colonies/100 ml	200	400	1/week	Grab
pH	Range (6.0 su – 9.0 su)		1/week	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following inspections were performed during the period beginning March 2004 and ending February 2006 for this facility.

Date – May 19, 2004

Inspector - LDEQ

Findings and/or Violations -

1. The old activated sludge was replaced in 2001 by an Austen Biojet Plant designed to handle 3 MGD.
2. Part of the old plant is used as an aerobic digester.
3. Two drying beds, 60' x 25', are used to dry the sludge before hauling it to Choctaw Landfill.
4. A 9" Parshall Flume is used for flow measurement.
5. Samples are manually composited by Curtis Environmental personnel.
6. Paperwork was collected for flow rates, rainfall, and sample results from 2003.

Date – April 21, 2005

Inspector - LDEQ

Findings and/or Violations –

1. Wastewater treatment plant appeared to be operating properly.
2. Part of the old plant was used as an aerobic digester.
3. The ultraviolet tube cleaner on one of the four tube modules was not operating properly. UV tubes had noticeable algae growth.

4. A 9" parshall flume is used for flow measurement.
5. Records were available at the facility.

Date – September 12, 2005

Inspector - LDEQ

Findings and/or Violations –

- Hurricane Katrina assessment noted that the plant was operating, had partial generator power, and there was no flooding or damage.

**B) Enforcement Actions**

A review of the files indicates the following most recent enforcement actions administered against this facility: \_\_\_\_\_

**LDEQ Issuance:**

Warning Letter

Enforcement Tracking No. WE-L-02-0742

Date Issued – August 19, 2002

Warning Letter

Enforcement Tracking No. WE-L-03-0716

Date Issued – November 26, 2003

Warning Letter

Enforcement Tracking No. WE-L-04-1171

Date Issued – November 29, 2004

**C) DMR Review**

A review of the discharge monitoring reports for the period beginning January 2003 through March 2005 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
BOD <sub>5</sub> , Monthly Avg.	001	March 2003	67 lb/day	72.4 lb/day
Fecal Coliform, Weekly Avg.	001	June 2003	400 cfu/100 ml	1,180 cfu/100 ml
BOD <sub>5</sub> , Monthly Avg.	001	August 2003	10 mg/l	11 mg/l
BOD <sub>5</sub> , Weekly Avg.	001	August 2003	15 mg/l	17 mg/l
BOD <sub>5</sub> , Monthly Avg.	001	December 2004	67 lb/day	103 lb/day
TSS, Monthly Avg.	001	December 2004	100 lb/day	102 lb/day

**XII.**

**ADDITIONAL INFORMATION:**

Please be aware that the Department will be conducting a TMDL in the Pearl River Basin scheduled for completion in 2008. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the TMDL. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.74 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD}_5: 8.34 \text{ lb/gal} \times 0.74 \text{ MGD} \times 10 \text{ mg/l} = 61.7 \text{ lb/day}$$

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.50 and 1.00 MGD.

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Continuous	Recorder
BOD <sub>5</sub>	1/week	3 Hr. Composite
Total Suspended Solids	1/week	3 Hr. Composite
Fecal Coliform Bacteria	1/week	Grab
pH	1/week	Grab
Total Mercury	1/quarter	Grab

#### Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

#### Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report each year for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

<u>Audit Period Begins</u>	<u>Audit Period Ends</u>	<u>Audit Report Completion Date</u>
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

### XIII

#### TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

### XIV

#### REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

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Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Town of Franklinton, Town of Franklinton Wastewater Treatment Facility, June 23, 2005.